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March 11, 2019

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

RE: Proceeding for Approval of the Public Utility Regulatory Policies Act of 1978
(PURPA) Avoided Cost Rates for Electric Companies, **Docket Number 1995-1192-E**

Dear Ms. Boyd:

Please find attached for electronic filing a *Petition to Intervene*, filed on behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy in the above-referenced matter.

Please contact me if you have any questions concerning this filing.

Sincerely,

s/ J. Blanding Holman, IV

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Enclosure
cc (w/encl.): Parties of Record

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 1995-1192-E

In re: Proceeding for Approval of
the Public Utility Regulatory
Policies Act of 1978 (PURPA)
Avoided Cost Rates for Electric
Companies

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PETITION TO INTERVENE

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, the “Conservation Groups”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R. 103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. On November 30, 2018, pursuant to S.C. Code Ann. § 58-27-860, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively, the “Companies”) filed an Application for approval of DEC and DEP’s updated Schedule PP tariffs, including revised Terms and Conditions and the standard purchased power agreement in support of Schedule PP.

2. This Petition to Intervene is timely filed, as the Commission has not established a deadline for intervention and direct testimony and exhibits of intervenors must be filed on or before April 9, 2019.

3. The South Carolina Coastal Conservation League is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with

individuals, businesses and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has members from across the State, including members who receive electricity service from the Companies and will be impacted by the decisions made in this proceeding regarding renewable energy and avoided cost rates. The address of CCL's main office is 328 East Bay Street, Charleston, SC 29402.

4. Southern Alliance for Clean Energy is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members from across the State, including members who receive electricity service from the Companies and who will be impacted by the decisions made in this proceeding regarding renewable energy and avoided cost rates. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

5. The Conservation Groups have participated as intervenors in multiple Commission proceedings related to renewable energy resources and avoided cost rates, including Docket Nos. 2014-246-E; 2015-53-E, 2015-54-E; 2015-55-E; 2015-203-E; 2015-204-E; 2015-205-E; 2015-362-E; 2016-1-E; 2016-2-E; 2016-3-E; 2017-1-E; 2017-2-E; 2017-3-E; 2018-1-E; 2018-2-E; 2018-3-E; and 2019-2-E.

6. The Conservation Groups and their members have direct and substantial interests that will be impacted by the decisions made in this proceeding regarding

renewable energy and avoided cost rates, and their interests cannot be adequately addressed by any other party. The Conservation Groups seek to ensure a full and fair valuation of renewable energy resources and the costs they are able to avoid. The Conservation Groups advocate for a diversified portfolio of distributed renewable energy resources that will lead to cleaner, safer, and healthier communities for all South Carolinians. The Conservation Groups' support for these policies and involvement in this proceeding will promote their members' interests as well as the broader public interest. Petitioning to intervene in this proceeding is also consistent with the Commission's policies encouraging maximum public participation in the issues before it.

7. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 11th day of March, 2019.

s/ J. Blanding Holman, IV

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STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 1995-1192-E

In re: Proceeding for Approval of the
Public Utility Regulatory Policies
Act of 1978 (PURPA) Avoided Cost
Rates for Electric Companies

CERTIFICATE OF SERVICE

I certify that the following persons have been served with a copy of the *Petition to Intervene* by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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This the 11th day of March, 2019.

s/ J. Blanding Holman, IV
J. Blanding Holman, IV
Southern Environmental Law Center